

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO.
)	
DAVID A. ZAWOISKI,)	
)	
Defendant.)	

CRIMINAL INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT

A. GENERAL ALLEGATIONS

1. At all time material to this information, the Allstate Insurance Company (Allstate) was a business with offices located throughout the United States, including offices in the Eastern District of Virginia. In addition to other insurance risks, Allstate insured homeowners against damages to their real estate.

2. From 1989 until June 2001, the defendant, DAVID A. ZAWOISKI, was employed by Allstate as a field adjuster. His duties included reviewing property damage claims submitted by Allstate customers and authorizing repairs, as well as payments for those repairs.

B. THE SCHEME AND ARTIFICE TO DEFRAUD

3. From in and around October 1996 through in and around May 2001, in the Eastern District of Virginia and elsewhere, the defendant, DAVID A. ZAWOISKI, devised and intended to devise a scheme and artifice to defraud Allstate and to obtain from Allstate money and property by means of materially false and fraudulent pretenses and representations.

4. It was part of the scheme and artifice to defraud that DAVID A. ZAWOISKI inflated the cost of repairs included in legitimate property damage claims submitted by Allstate customers.

5. It was a further part of the scheme that DAVID A. ZAWOISKI falsely identified a co-schemer as one of the workmen who performed the repairs required by the claimed damages.

6. It was a further part of the scheme that DAVID A. ZAWOISKI approved payments from Allstate to his co-schemer for the amounts by which the legitimate property damage claims had been inflated. The defendant personally delivered these payments by Allstate checks to the co-schemer who, prior to July 2000, deposited most of the checks into an account he maintained at the First Virginia Bank.

7. It was a further part of the scheme that the co-schemer drew checks on his personal account at the First Virginia Bank in the Eastern District of Virginia payable to DAVID A. ZAWOISKI.

These checks returned to DAVID A. ZAWOISKI approximately half of the money which had been generated by the Allstate checks which DAVID A. ZAWOISKI had authorized. DAVID A. ZAWOISKI either cashed these checks or deposited them into an account he maintained at the First Union National Bank in the Eastern District of Virginia.

8. It was a further part of the scheme that, beginning in July 2000 when his co-schemer moved to Houston, Texas, DAVID A. ZAWOISKI began to forge his co-schemer's endorsement on the Allstate checks and to deposit these checks into an account which his co-schemer maintained at the Bank of America. His co-schemer continued to return approximately half of the money to DAVID A. ZAWOISKI by mailing from Texas to the Eastern District of Virginia checks drawn on the co-schemer's Bank of America account made payable to DAVID A. ZAWOISKI who deposited the checks into his First Union National Bank account in the Eastern District of Virginia.

C. THE USE OF THE MAILS

9. On or about May 16, 2001, in the Eastern District of Virginia, the defendant, DAVID A. ZAWOISKI, for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, did knowingly take and receive from the United States Postal Service a mail matter or thing, that is, a

check drawn on his co-schemer's Bank of America account, payable to DAVID A. ZAWOISKI in the amount of \$2,500.

(All in violation of Title 18, United States Code, Section 1341)

Paul J. McNulty
United States Attorney

By: _____
John J. Klein
Assistant United States Attorney